

JONES DAY

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December 4, 2020

BY ECF

Hon. Sanket J. Bulsara
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Rubin v. HSBC Bank USA, NA, et al.*,
Case No. 1:20-cv-4566 (E.D.N.Y.)

Dear Judge Bulsara:

I am writing to explain why Experian Information Solutions, Inc.'s Answer was not timely filed, to apologize to the Court, and to request that Experian be permitted to file the Answer out of time.

The deadline for Experian to respond to the Complaint was November 20, 2020. Due to work from home difficulties and an inadvertent calendaring mistake, I failed to note the proper deadline for Experian's response to the Complaint. I apologize to the Court, Plaintiff and Plaintiff's counsel for this oversight, and I am taking additional steps to ensure that this error does not happen in the future.

I have communicated with counsel for Plaintiff, Adam Singer and Brett Sherman, who have graciously consented to the request to file out of time. Experian's proposed Answer and Affirmative Defenses is attached as Exhibit 1.

I appreciate the Court's consideration of this request.

Respectfully submitted,

/s/ Ashley D. Burman

Ashley D. Burman

cc: All counsel (by ECF)